

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	Case No. 16-34028
	§	
NORTHSTAR OFFSHORE GROUP, LLC	§	
	§	
Debtor.	§	Chapter 11
	§	
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JAMES KATCHADURIAN, Litigation	§	
Trustee, on behalf of Northstar Litigation	§	
Trust,	§	
	§	ADVERSARY NO. 18-03079
Plaintiff,	§	
v.	§	
	§	
NGP ENERGY CAPITAL	§	
MANAGEMENT, LLC; NGP X US	§	
HOLDINGS, L.P.; NGP NATURAL	§	
RESOURCES X, L.P.; NGP X PARALLEL	§	
HOLDINGS, L.P.; NGP NATURAL	§	
RESOURCES X PARALLEL FUND, L.P.;	§	
NOG ROYALTY HOLDINGS, LP;	§	
CHRISTOPHER RAY; JESSE BOMER;	§	
TOMAS ACKERMAN; DAVID ALBIN;	§	
DAVID HAYES; S. GLYNN ROBERTS;	§	
GAYLON FREEMAN; MARK STEVENS;	§	
and JAMES P. ULM, II,	§	
	§	
Defendants.	§	

**MOVANTS' JURY DEMAND**

In accordance with Fed. R. Civ. Pro. 38, applicable through Fed. R. Bankr. P. 9015(a), Defendants NGP Energy Capital Management, L.L.C., NGP X US Holdings L.P., NGP Natural Resources X, L.P., NGP X Parallel Holdings, L.P., NGP Natural Resources X Parallel Fund, L.P., NOG Royalty Holdings, L.P., Christopher Ray, Jesse Bomer, Tomas Ackerman, David Albin and David Hayes (collectively, the “**Movants**”) hereby demand a trial by jury under the

Seventh Amendment of the United States Constitution. *See Granfinanciera, SA v Nordberg*, 492 US 33, 64 (1989). The Movants do not consent to a jury trial held by the Bankruptcy Court.

If it is determined that the Bankruptcy Judge, absent consent of the parties, cannot enter final orders or judgment consistent with Article III of the United States Constitution, the Movants do not consent to entry of final orders by the Bankruptcy Judge.

Simultaneously with the filing of this Jury Demand, the Movants are filing a motion to withdraw the reference to Bankruptcy Court so that the jury trial may be conducted in District Court.

Dated: June 21, 2018.

Respectfully submitted,

**THOMPSON & KNIGHT LLP**

By: /s/ David M. Bennett

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**ATTORNEYS FOR NGP ENERGY  
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RESOURCES X PARALLEL FUND, L.P.;  
NOG ROYALTY HOLDINGS, LP;  
CHRISTOPHER RAY; JESSE BOMER;  
TOMAS ACKERMAN; DAVID ALBIN;  
AND DAVID HAYES**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of June, 2018 a true and correct copy of the foregoing was served (i) on the parties via the Court's electronic notification system; and (ii) on the below parties by regular US mail.

/s/ David M. Bennett

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